

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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LIBERTY MUTUAL INSURANCE  
COMPANY,

Plaintiff,

v.

THE BLACK & DECKER  
CORPORATION, BLACK & DECKER  
INC., BLACK & DECKER (U.S.)  
INC., EMHART CORPORATION,  
and EMHART, INC.,

Defendants.

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) C.A. No. 96-10804-DPW  
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) Case No. 1:04-CV-10674-DPW  
) (Old Southington Landfill Site)  
)

) Case No. 1:04-CV-10678-DPW  
) (Shaffer Landfill Site)  
)

) Case No. 1:04-CV-10680-DPW  
) (Solvents Recovery Service Site)  
)

**JOINT MOTION TO EXTEND TIME**

Pursuant to Local Rule 7.1, plaintiff, Liberty Mutual Insurance Company ("Liberty Mutual"), and defendants, The Black & Decker Corporation, et al. ("Black & Decker"), hereby jointly move that the Court extend the periods for filing certain submissions, pursuant to the Court's September 23, 2004 Scheduling Order, as follows:

1. The due date for the parties' respective Motions for Summary Judgment regarding the Shaffer Landfill, Solvents Recovery Service, and Old Southington Landfill sites shall be extended to October 20, 2004. The oppositions to those motions will be due on November 24, 2004, and the reply memoranda concerning those motions will be due on December 10, 2004.

WHEREFORE, the parties respectfully request that the Court grant the extension requested in this motion, approving the due dates set forth above.

**LIBERTY MUTUAL  
INSURANCE COMPANY**

By its attorneys,

/s/ Janice Kelley Rowan

Ralph T. Lepore III (BBO 294420)  
Janice Kelley Rowan (BBO 265520)  
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Dated: October 18, 2004

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**THE BLACK & DECKER CORPORATION,  
et al.**

By their attorneys,

/s/ Richard L. Binder

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